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March 12, 2012

Hon. Sterling Johnson, Jr.  
U.S. District Judge  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Vladimir Khmelnitski, Ind. No. 10 Cr. 00459  
(SJ); Bail Conditions and Post-Verdict Electronic Monitoring

Dear Judge Johnson:

I am writing to request that the Court clarify the electronic monitoring conditions for the Pretrial Services Officer and, that now that the defendant is on house arrest, that the Court release the cash bail security to the surety.

First, Pre-Trial Services was not present when the Court imposed electronic monitoring and they have asked that I request that the Court clarify the conditions of this defendant's bail restrictions. The Court indicated that the defendant could go to work, and attend religious services, medical appointments and appointments with counsel.

Specifically we ask that the Court allow the defendant to work from 9 a.m. to 5 p.m. at DMS Jewelry, Inc., located at 21-21 41 Avenue, Suite 3B, Long Island City, NY 11101; Tel. (718) 786-5343. We also request that the Court allow the defendant to do deliveries of jewelry for the firm during the day in the areas where he is allowed to travel.

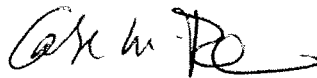
Second, we attach a letter from his synagogue so that the Court and Pretrial know where and when he will be attending services. The letter includes many times and days during the week but we only request that defendant be allowed to attend Sabbath services on Friday evening and Saturday morning as reflected in the letter.

Finally, Denis Bondin, who put up the \$20,000 dollars cash bail has requested that since the defendant is now on electronic monitoring, that the cash bail be released. We

believe that the added conditions that the Court added so make the cash bail unnecessary. Although I was not counsel earlier in the case, I understand that the cash bail was added so that electronic monitoring would be unnecessary. We, therefore, request that the cash bail be released and that the other conditions of electronic monitoring be clarified as requested above.

I thank the Court for its attention to this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Labe M. Richman", with a stylized flourish at the end.

Labe M. Richman

cc: AUSA Daniel Brownell,  
AUSA Karen Hennigan



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# *Young Israel of Brighton Beach, Inc.*

AFFILIATED WITH THE NATIONAL COUNCIL OF YOUNG ISRAEL, INC.

293 Neptune Avenue • Brooklyn, N.Y. 11235 • (718) 648-0843

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Efraim Zaltzman  
*Rabbi*

To whom it may concern:

Please allow Mr. Vladimir Khmel'nitski to attend religious services at the Young Israel of Brighton Beach  
293 Neptune Ave. Brooklyn, NY at the following times:

Sunday: 8:15 – 9:15 am

Mon. through Fri. 7am – 8am

Fri 7pm – 8pm

Sat: 9am – 1pm

Sat. Half hour before sunset till nightfall.

After April 15<sup>th</sup> Sun through Thurs.. additional eve. Services 7:30 – 8:10pm

For any Questions, please call me 917 543 3785

Rabbi Efraim Zaltzman